UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG - 3 2010

OFFICE OF
AIR AND RADIATION

The Honorable Joe Barton
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515-6115

Dear Congressman Barton:

Thank you for your letter of June 11, 2010, to Administrator Jackson, co-signed by Congressman Michael Burgess, regarding the revisions to the National Ambient Air Quality Standards (NAAQS) for ground-level ozone (O_3) proposed by the U.S. Environmental Protection Agency (EPA) in January 2010. The Administrator asked me to respond to your letter.

In your letter, you raise a number of questions about the potential costs of reaching attainment with revised ozone NAAQS and express concerns about potential implementation challenges. It is important to remember that under the Clean Air Act, decisions regarding the NAAQS must be based solely on an evaluation of the health and environmental effects evidence. EPA is prohibited from considering costs or ease of implementation in setting or revising the NAAQS. We do consider costs during the implementation process, but cost estimates generated as part of EPA's Regulatory Impact Analysis (RIA) for the proposed ozone NAAQS are intended only for illustrative purposes and may not reflect the actual control strategies that would be adopted by state and local areas to meet any revised standards.

I have responded to each of the eleven questions you raise in your letter below:

1) **Under Sections 108 and 109 of the Clean Air Act (CAA), EPA is authorized to set NAAQS for certain criteria pollutants, including ozone, and the Act sets out specific procedures for revising these standards.**

   a) **In proposing the new standards, why isn't EPA conducting a full analysis of all available data, including more recent data?**

   b) **In proposing the standards, why isn't EPA following the express procedures set forth in Section 109 of the CAA?**

   It is widely accepted that agencies may on their own initiative reconsider final decisions regardless of whether the applicable statute or regulations provide for such review. EPA has decided to reconsider the 2008 ozone rule, based on the scientific and technical record that

existed at that time, in order to ensure the ozone NAAQS meets the substantive requirements of section 109(b) of the Act. EPA's reconsideration is thus distinct from the process set forth in sections 108 and 109.

In 2009, the Administrator reviewed the information in the 2008 final rule, and the recommendations of the Clean Air Scientific Advisory Committee (CASAC), and took note of a ruling issued by the U.S. Court of Appeals for the District of Columbia Circuit on the 2006 Particulate Matter NAAQS decision. As described in section I.D.1 of the 2010 ozone reconsideration proposal (75 FR 2943). Based on her review of this information, the Administrator was concerned as to whether the revisions to the primary and secondary O_3 standards adopted in the 2008 final rule met the requirements of the CAA, in light of the body of scientific evidence before the Agency. The importance of the O_3 NAAQS to public health and welfare weighed heavily in favor of reconsidering parts of the 2008 final rule as soon as possible. Based on these considerations, the Administrator initiated a rulemaking to reconsider parts of the 2008 O_3 NAAQS.

Separately, EPA is conducting a review of the ozone standards pursuant to sections 108 and 109. As part of this review, EPA will consider the new scientific evidence that has become available since the last review of the ozone standard which was completed in 2008.

2) Under the Clinton Administration's 1997 ozone standards:

a) What types of measures have been required by state and local governments to come into compliance with those standards?

EPA has worked closely with state, local and tribal governments to improve air quality by reducing emissions of ozone-forming chemicals. The partnerships have yielded positive results. In fact, 340 counties of the 412 counties designated nonattainment for the 1997 ozone standard have air quality that meet the 1997 standards. State and local governments initially relied on an array of federal control measures, including the NOx SIP Call, the Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements, the Heavy Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements, and the Clean Air Nonroad Diesel Rule. In areas where the federal measures were not sufficient to demonstrate attainment of the standard, state and local governments have adopted a variety of measures at their discretion depending on the mix of pollution sources in the areas. For example, many states adopted reasonably available control technology (RACT) for reducing volatile organic compounds and nitrogen oxides for industries in the nonattainment area. States have also developed transportation control measures to reduce mobile source emissions and developed cement plant controls, compressor engine controls and diesel engine emission reduction programs.

The States that comprise the Ozone Transport Region (OTR) in the Northeast and Mid-Atlantic have worked together to develop a list of candidate control measures and in some instances "model rules" for several source categories of volatile organic compounds (VOCs) and nitrogen oxides (NOx). In many instances, these model rules have been adopted and approved as revisions to the State Implementation Plans -- in addition to all of the applicable

requirements of Part D of the CAA for ozone nonattainment areas. In many cases the States in the OTR have adopted model rules more stringent than the otherwise applicable Federal rules for area sources. Each state has worked to adopt the measures through their state rulemaking procedure. The control measures included the following: Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations; Consumer Products; Portable Fuel Containers; Adhesives and Sealants; Diesel Chip Reflash; Architectural, Industrial and Maintenance Coatings (AIM); Additional Nitrogen Oxides (NOx) RACT Control Measures; Mobile Equipment Repair and Refinishing (MERR); Graphic Arts; Asphalt Formulation; Asphalt Paving Production; Portland Cement Plants; Glass Manufacturing and HEDD high electric demand day program.

b) What were the estimated costs for compliance with the 1997 standards and how do those compare with estimated costs for the proposed new standards?

As noted above, the Administrator is precluded by law from considering costs in setting or revising the NAAQS. However, Executive Order 12866 requires that a regulatory impact analysis (RIA) of alternative standards be prepared as part of the federal rulemaking process.

Based on the illustrative control scenarios evaluated in the RIA, estimated annualized costs for partial attainment of the 1997 O_3 NAAQS in the target implementation year of 2010 were estimated to be $1.1 billion in 1990 dollars (or $1.6 billion when updated to 2006 dollars).[1] This estimate did not include costs for areas unable to attain the standard by the target year of 2010. We also estimated that attainment by 2010 in all areas would have cost $9.6 billion in 1990 dollars (or $13.4 billion when updated to 2006 dollars).

Our draft RIA for the 2010 reconsideration of the O_3 NAAQS is different from the RIA for the 1997 NAAQS, in that the 2010 analysis reflects our estimates for bringing all communities with monitored ozone problems into compliance with the NAAQS. Therefore, higher costs are to be expected. Costs (in 2006 dollars) in the implementation year of 2020 have been estimated to be $19 - $25 billion for a standard of 0.070 ppm and $52 - $90 billion for a standard of 0.060 ppm.[2] These estimated costs were calculated based on assuming full attainment of the standards in all areas, and include federal rules and application of current technologies as well as new or innovative approaches and technologies. The higher costs in the 2010 draft RIA reflect the fact that many of the least costly emission reductions have already occurred. It is not clear which controls states will choose to reach attainment with a reconsidered NAAQS; in light of this uncertainty, EPA applied relatively conservative assumptions that may result in an overestimation of costs. EPA received numerous

---

[1] Regulatory Impact Analyses (RIA) for the 1997 Ozone and PM NAAQS and Proposed Regional Haze Rule, Ch 7: Emission Reduction and Cost Impacts for Ozone Alternatives, pg 7-1, http://www.epa.gov/ttn/oarpg/naaqsfin/ria/riach-07.pdf

[2] Updated Regulatory Impact Analysis (RIA) for the Reconsideration of the 2008 Ozone National Ambient Air Quality Standard (NAAQS), S2: Supplemental Regulatory Impact Analysis of Alternative Standards 0.055 and 0.060 ppm for the Ozone NAAQS Reconsideration, Table S2.9, p. S2-19 http://www.epa.gov/ttn/ecas/regdata/RIAs/s2-suppmental_analysis-060&05_55_11-5-09.pdf

comments as a result of public review of the 2010 draft RIA and is currently evaluating all comments.

c) What analysis, if any, did EPA conduct relating to the potential impacts on employment of the 1997 standards?

EPA did not analyze the potential employment impacts of the 1997 ozone standards.

d) What were EPA's projections with regard to attainment of the 1997 standards, and approximately how many counties in the United States have still not been able to come into compliance?

Air quality modeling completed as part of the 1997 ozone RIA estimated that 19 areas would not be able to attain the 0.08 ppm standard by 2010 (http://www.epa.gov/ttn/oarpg/naaqsfin/ria/riach-04.pdf). Originally 113 areas (440 counties) were designated nonattainment in June 2004 and as of June 15, 2010, 94 areas (340 counties) are in compliance with the standard. Of the remaining 19 original areas, based on state/local monitoring data only one area is currently considered out of compliance, as the other 18 have not reached their attainment dates.

Nine counties in the Dallas-Fort Worth area have missed the June 15, 2010 deadline for meeting the 1997 standard design value: Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant. EPA is working closely with the State of Texas about next steps to help the Dallas-Fort-Worth area meet the 1997 ozone standards. We expect to propose a mandatory reclassification action for the 9 counties in Texas this summer, which will give the area more time to meet the 1997 ozone standards.

e) What are the primary reasons for the inability of these counties to come into compliance?

The 9 counties that make up the Dallas/Fort Worth nonattainment area did not attain by the moderate area attainment date. However, the area has made considerable progress in improving air quality and fell just short of the goal. The "design value" for the area has improved from 102 parts per billion (ppb) in 2000 to 86 ppb in 2009, just two ppb short of attaining the 1997 ozone standard. The air quality improvement in the area was the result of a variety of federal, state and local measures, including federal motor vehicle controls, cement plant controls, compressor engine controls and diesel engine emission reduction programs. Continued fleet turnover and additional pollution controls that were implemented in spring 2010 will contribute to continued improvements in ozone levels.

3) Under the Obama Administration's proposed ozone standards, we understand that EPA projects, based on 2006-2008 data, that of the 675 counties that currently monitor ozone levels, 515 counties (76 percent) would violate a 0.070 ppm standard, and 650 counties (96 percent) would violate a 0.060 ppm standard.

a) Please identify the 515 counties that would violate a 0.070 ppm standard, and the expected time needed for attainment.

b) Please identify the additional 135 counties that would violate a 0.060 ppm standard, and the expected time needed for attainment.

We have ozone monitoring data from state, local, tribal, and other ozone monitoring stations for 675 counties that met the data completeness requirements for the 2006-2008 monitoring period.[3] Based on these data, we have calculated that 515 (77 percent) of these counties would violate 0.070 ppm ozone standard and that 650 (96 percent) of these counties would violate a 0.060 ppm ozone standard. Attachment 1 (County Primary Ozone Levels 06-08.xls) gives a list of the 515 counties which would violate a 0.070 ppm standard (dark blue) and the additional 135 counties which would violate a 0.060 ppm standard (light blue) during the 2006-2008 monitoring period.

EPA has not conducted an area-by-area analysis of the expected time needed for attainment for each county that currently has air quality data indicating a violation of a potential 0.070 ppm ozone standard or a potential 0.060 ppm ozone standard. Ultimately, the eventual classification of each designated nonattainment area according to Clean Air Act provisions will establish the maximum number of years in which attainment must be achieved. Attainment of the NAAQS in each designated nonattainment area will come from a combination of local, regional, and national control measures. Under the CAA, states, not EPA, choose the mix of regional and local controls that will help bring areas in the state into attainment in conjunction with national control measures.

As part of the regulatory impact analysis for the 2008 rule revising the ozone standard, EPA did conduct future year modeling simulations to estimate which counties will remain nonattainment in 2020 after the implementation of recently-promulgated federal control programs[4] and those controls that states would have to implement to attain pre-existing ozone and fine particulate standards. The counties projected to violate the primary eight-hour standard in 2020 (for 0.070, 0.065, and 0.060) are shown in the attached map (County-LevelOzoneDesignValueMaps0608and2020.pdf) and table (CountyOzoneLevels2020primary.pdf). This analysis estimates that 99 counties will not be able to attain the 0.070 ppm standard by 2020 without additional local or regional control measures or without additional federal measures that may be promulgated in the future. And

---

[3] The "other" category of ozone monitoring stations includes stations operated by universities, industry, EPA, and other federal agencies. Of these, the National Park Service (NPS) operates the most stations. NPS operated about 41 ozone monitoring stations in 2007-2009. These monitoring stations operate under Quality Assurance Project Plans that have been approved by EPA and their data is submitted to EPA's Air Quality Systtem. These data have been considered in preparing answers to questions regarding the number of counties meeting potential ozone standards.

[4] The modeled emissions reflect the expected reductions from federal programs including the Clean Air Interstate Rule, the Clean Air Mercury Rule, the Clean Air Visibility Rule, the Clean Air Nonroad Diesel Rule, the Light-Duty Vehicle Tier 2 Rule, the Heavy Duty Diesel Rule, proposed rules for Locomotive and Marine Vessels, and for Small Spark-Ignition Engines. The state and local level mobile and stationary source controls identified for additional reductions in emissions for the purpose of attaining the current PM 2.5 and ozone standards are illustrative and may not match eventual strategies implemented by the States. More details on this analysis are available at http://www.epa.gov/ttn/ecas/regdata/RIAs/452_R_08_003.pdf

this analysis projects that 451 counties will not meet the 0.060 ppm standard in 2020 without the adoption of additional local or regional control measures or without additional federal measures that may be promulgated in the future.

4) **According to the attached map from EPA's Clean Air Status Trends Network (CASTNET) 2008 Annual Report, it appears many areas of the country that do not currently have ozone monitors would also be likely to violate the new smog standards, including in very rural and remote areas.**

   a) **How many counties don't currently have ozone monitors?**

   According to the US Census Bureau, there were 3221 counties in the 50 states, Puerto Rico, and the US Virgin Islands as January 1, 2010. Our most recent data identifies 688 counties with state, local, tribal, or National Park Service ozone monitors, leaving 2533 counties (79 percent) without an ozone monitor.

   b) **Based on CASTNET data and any other data EPA may have regarding ozone levels in non-monitored counties, how many additional counties could be in violation of EPA's proposed ozone standards if a monitor were present? Please identify those counties using the CASTNET data and any other data available, and the expected time needed for attainment.**

Of the approximately 41 ozone monitors operated by the National Park Service, 23 are at CASTNET sites, and the answers to the previous questions incorporate the data from these 23 monitors. There are also 57 other CASTNET sites at which the ozone monitor is operated by an EPA contractor. These latter sites are currently the subject of an upgrade effort. Until this upgrade effort is completed, EPA does not use their data to determine whether a county meets the ozone standard. EPA does not have any other type of data from which we use to make estimates of how many additional counties could be in violation of the proposed ozone standards if a monitor were present.

   c) **Would there be areas with monitored air quality that attain the proposed standards but that might nevertheless be considered to be in "nonattainment" because they are in a Consolidated Metropolitan Statistical Area (CMSA) in which one monitor or more exceeds the proposed standards?**

The CAA defines an area as nonattainment if it has monitored air quality that is violating the NAAQS or if it is contributing to a violation in a nearby area. Therefore, an area that is monitoring attainment, or that has no monitoring data, may be included in a nonattainment area due to its contributions to a nearby violating area. EPA works with states to evaluate the appropriate nonattainment area boundary on a case-by-case basis, ensuring that emissions sources that contribute to ozone formation are part of the nonattainment area.

5) According to the EPA Fact Sheet for the Obama Administration's proposed ozone standards, the implementation costs range from $19 to $90 billion annually while EPA projects the value of the health benefits would range from $13 to $100 billion per year.

a) What are the primary studies EPA is relying upon in the development of its health benefits estimates? What are the major uncertainties in those studies that could affect the estimates?

In calculating the estimated public health benefits of the revised ozone NAAQS, EPA quantified the reduction in premature mortalities and morbidities expected to result from attaining a more health-protective ozone standard. This included benefits of reductions in both ozone and fine particles ($PM_{2.5}$) that could be expected to result from controls aimed at reducing ozone precursors. To quantify the change in ozone-related premature mortality, we drew risk estimates from an array of 6 time series and meta-analytic ozone mortality studies: Bell et al. (2004), Huang et al. (2004), Bell et al. (2005), Ito et al. (2005), Levy et al. (2005), and Schwartz et al. (2005). This approach was endorsed by the National Academy of Sciences. When estimating $PM_{2.5}$-related mortality, EPA applied risk estimates drawn from two large long-term cohort studies: Pope et al. (2002) and Laden et al. (2006). When estimating morbidity effects, EPA applied risk estimates drawn from over 25 epidemiology studies that covered 5 health endpoints for ozone, including adult and infant respiratory hospital admissions, asthma-related emergency room visits, school absence days, and minor restricted activity days, as well as 11 health endpoints for PM. Complete information regarding these studies may be found in the ozone RIA and the supplemental benefits analysis completed for the reconsideration. Specifically, Table 6.2 of the 2008 RIA (http://www.epa.gov/ttn/ecas/regdata/RIAs/452_R_08_003.pdf, pp. 286-287) lists all the studies included in the 2008 benefits assessment. The other functions included in the supplemental benefits assessment for the reconsideration are described in section S3.2 of the supplement (http://www.epa.gov/ttn/ecas/regdata/RIAs/s1-supplemental_analysis_full.pdf, pp. 40-42).

Consistent with the recommendations of the 2002 National Academy of Sciences (NAS) in its report "Health Benefits of Proposed Air Pollution Regulations," EPA carefully considered the sensitivity of the overall benefits estimates to uncertainty and variability in key input parameters. The results of this analysis may be found in the benefits chapter of EPA's Regulatory Impact Analysis (RIA) (again, see Chapter 6 of EPA's 2008 RIA), and also the supplemental benefits analysis for the reconsideration (links provided above).

b) How many of the health-based studies included in the criteria document for the proposed ozone standards were based on statistically significant evidence compared to those studies that were not?

The statistical significance of individual study findings has played an important role in EPA's evaluation of the study's results, and EPA has placed greater emphasis on studies reporting statistically significant results. Statistical significance is an indicator of the strength of the relationship between ozone and the health outcome reported in an individual study. However, it is important to emphasize that statistical significance is only one component of the evaluation and integration of evidence for a scientific assessment.

It is important not to focus on results of statistical tests to the exclusion of other information. In the broader evaluation of the evidence from many epidemiologic studies, EPA has also emphasized the *pattern* of results for drawing conclusions on the relationship between ozone indicators and health outcomes, as well as consideration of the integration of epidemiologic evidence with findings of laboratory studies. In addition, it is worth noting that study-counting is considered to be the simplest and least informative means of combining information across studies, since it requires that studies be divided into two categories and does not consider important information on the pattern of information across studies and the influence of study size and design.

Recognizing these important limitations, EPA staff has examined the studies included in chapters 6 and 7 of the 2006 Ozone Criteria Document, focusing on controlled human exposure and epidemiologic studies of the effects of acute ozone exposures on respiratory morbidity as well as mortality, and counted studies that reported any statistically significant association between ozone exposure and a health outcome. Of the 51 epidemiologic studies included in the Ozone Criteria Document with respiratory morbidity as the outcome, 46 had statistically significant findings (90 percent). In addition, 67 percent of the studies on respiratory hospital admissions and emergency department visits had statistically significant results (42 of 63 studies). Forty-eight of 72 studies examining mortality (67 percent) reported results that were statistically significant. Of the 134 controlled human exposure studies in the 2006 Ozone Criteria Document, 94 percent reported statistically significant effects on lung function, airway responsiveness, or inflammation. There were an additional eight modeling papers based on controlled human exposure studies that all found statistically significant effects of ozone on lung function or pulmonary inflammation.

c) How many of the new health-based studies included in the provisional assessment for the proposed ozone standards were based on statistically significant evidence compared to those studies that were not?

EPA staff has surveyed the studies included in the Provisional Assessment, focusing on epidemiologic and controlled human exposure studies that looked at mortality or respiratory morbidity effects of acute exposure to ozone. Similar to the studies included in the Ozone Criteria Document, the majority of epidemiologic studies from these sections of the provisional assessment reported statistically significant findings. The percentage (number) of epidemiologic studies with statistically significant results on mortality, respiratory morbidity, and respiratory hospital admissions/emergency department visits were 92 percent (11 of 12), 57 percent (8 of 14), and 64 percent (9 of 14), respectively. There was only one new controlled human exposure study in the Provisional Assessment. This paper reported statistically significant effects on lung function at 0.070 ppm and above. There were three new studies in the Provisional Assessment that analyzed existing data from prior controlled human exposure studies. All three of these studies found statistically significant effects of ozone on lung function.

d) Can EPA provide any assurances that the value of the health benefits will outweigh the implementation costs?

EPA's RIA includes a range of estimates for both the costs and benefits of attaining revised O_3 NAAQS. These estimates, which reflect systematic consideration of a range of underlying assumptions and values, are intended for illustrative purposes only. In general, the ranges of both benefit and cost estimates are very broad, and for four of the five alternative NAAQS standards, the highest benefits estimate is greater than the highest cost estimate. The Agency is prohibited by the CAA from taking costs into consideration in setting or revising these standards.

6) **Under the Obama Administration's proposed ozone standards, what control requirements, including offsets, transportation planning measure or other measures, may apply to nonattainment areas?**

The Clean Air Act stipulates that various requirements apply to areas designated nonattainment for ozone. Which requirements nonattainment areas need to meet are also tied to their classification. EPA is currently drafting a proposed regulation that will describe in greater detail how these Clean Air Act requirements apply to areas designated nonattainment for the 2010 standards.

The CAA title I, part D provides requirements for designated nonattainment areas. The provisions of part D establish deadlines for attainment of ozone standards and deadlines for submitting SIPs that demonstrate how the state will attain the standards and meet specific requirements, such as: 1) Reasonably available control technology (RACT); 2) Inspection and maintenance programs; 3) Major source applicability cut-offs for purposes of RACT; 4) Rate of Progress reductions; 5) Stage II vapor recovery; 6) Clean fuels fleet program under section 183(c)(4) of the CAA; 7) Clean fuels for boilers under section 182(e)(3) of the CAA; 8) Transportation control measures; 9) Enhanced (ambient) monitoring; 10) Transportation controls under section 182(c)(5); 11) Vehicle miles traveled provisions; 12) NOx requirements under section 182(f) of the CAA; 13) Attainment demonstrations; and 14) New Source Review (NSR).

a) **It appears the proposed standards would create a significant number of new nonattainment areas in the Western United States. How would nonattainment in rural or remote Western states and tribal lands be addressed?**

In general, the Clean Air Act prescribes the same requirements for all areas designated nonattainment. Under section 182(h) of the CAA, an area that has a violating monitor but is not in or adjacent to a metropolitan area and does not significantly contribute to its own ozone concentrations can be considered a "rural transport" area. For these areas, the requirements for Marginal areas would apply. The proposed ozone implementation rule will provide further details on the criteria for determining that an area is a rural transport area and the requirements applicable to those areas.

For tribal lands, EPA has determined that tribes are not required to meet plan submittal and implementation deadlines in the CAA. In general, few major sources are located on tribal land. In many cases, air quality in Indian country is affected by the transport - both long

range and shorter distance transport - of pollutants. EPA intends to work closely with tribes and with states that are developing plans that have the potential to impact tribal lands. The proposed ozone implementation rule will describe in greater detail the requirements for tribal lands. Where tribes do not elect to submit implementation plans, EPA may prepare federal plans for tribal lands.

b) In the event that an area fails to attain any new standards by the applicable date, what would be the potential consequences, including any sanctions or penalties?

There are no sanctions that apply to areas for failure to attain the new standards. However, the Clean Air Act has provisions that require additional planning and measures – as well as additional time to undertake those measures – for areas that do not attain the standards by the applicable date (ranging from 3 years from date of designations for areas classified as Marginal to 20 years to areas classified as Extreme.

Section 181(b)(2) specifies that areas that fail to attain by the applicable date will be reclassified to either the next higher classification for the area or the classification applicable to the area's design value (except that areas will not be reclassified to Extreme). Such areas would then be given additional time, but would need to meet all of the requirements that apply to the new classification, including preparation of a new attainment demonstration to meet the attainment date applicable to the new classification. In addition, nonattainment areas that are classified as Moderate, Serious, Severe, or Extreme must include in their SIPs contingency measures consistent with section 172(c)(9) and those classified as Severe or higher must include contingency measures consistent with section 182(c)(9). Contingency measures are additional controls to be implemented in the event the area fails to attain by its attainment date. These contingency measures must be fully adopted rules or measures which are ready for implementation quickly upon failure to attain.

Further, section 185 of the Clean Air Act requires that areas classified as Severe or Extreme must include in their SIPs a provision that requires major stationary sources located in the area to pay a fee to the State as a penalty for each calendar year beginning after the attainment date (15 to 17 years from date of designation as ozone nonattainment for Severe areas and 20 years from date of designation for Extreme areas), until the area is redesignated as an attainment area. Should Severe or Extreme nonattainment areas fail to attain by their attainment date (15 to 17 years for Severe areas, and 20 years for Extreme areas), they would also have to prepare a new attainment demonstration to meet a new attainment date under section 179(d) of the Act. Under this provision, the Administrator may also require additional measures. States must include all these measures in their SIPs to provide for attainment as expeditiously as practicable. We issued guidance on section 185 in January 2010 that allows states to propose an equivalent program to monetary penalties. To view it, please visit http://www.epa.gov/glo/pdfs/20100105185guidance.pdf

EPA's proposed ozone implementation rule will provide additional details on how these requirements apply to areas designated nonattainment under the 2010 standards.

c) What will happen to states or localities that cannot come into compliance with the proposed standards because of a lack of economically or technically feasible technology necessary to attain compliance?

States are required by the Clean Air Act to attain the ozone standards as expeditiously as practical. Economical and technical constraints may affect the practicality of attaining the standards by any specified date. Should an area fail to attain the standards by the specified attainment date, the area would be "bumped up" to a higher classification; they are given more time to meet the standard, but required to conduct an additional round of planning to meet the standard by the new applicable attainment date for their new classification. Areas that can still not attain by the new attainment date would continue to conduct additional rounds of planning aimed at providing for attainment as expeditiously as practicable. There are no sanctions beyond these additional planning requirements imposed on areas that continue to meet their planning requirements even if they can not attain the standards.

d) What will happen to states or localities that have natural background ozone levels, and/or ozone levels due to transport from outside the United States, that are currently close to or exceed the new standards?

(1) Will such areas be designated as being in nonattainment?

(2) Will EPA require states or localities to attain standards lower than concentrations below the non-controllable background levels?

Any area violating the NAAQS must be designated nonattainment. In cases where the violation is due in part to pollution originating from outside the US, the Clean Air Act has provisions that provide some relief from otherwise applicable nonattainment area requirements. Natural background levels of ozone in the U.S. are quite low: according to Fiore et al. (2003), natural O_3.—i.e., concentrations of ozone that result from natural processes independent of any man-made contribution—vary by location and season. They are generally no lower than 10 and no higher than 40 parts per billion (ppb), and mostly in the range of 15-25 ppb. Natural background ozone results from several processes, including downward incursions of stratospheric ozone into the troposphere and chemical reactions between NOx and/or VOC emissions from trees, wildfires, and lightning. In general, however, natural background concentrations are far below the proposed range for the ozone NAAQS (0.060-0.070 ppm) and therefore, natural background alone would be insufficient to cause an area to be out of attainment with a new NAAQS in this range.

In addition to natural background, the transport of man-made emissions of ozone precursors also contributes to local and regional concentrations. However, the large majority of emissions contributing to NAAQS violations in the U.S. come from local, regional, and/or national sources.

To the extent that either naturally occurring ozone or transported emissions from international sources contribute to violations of a NAAQS in a designated nonattainment area, the Clean Air Act provides mechanisms to address these issues. Specifically, section

179B provides relief in the implementation process for the portion of emissions transported from international sources for areas that are consistently affected by these emissions. In addition, Section 319 provides statutory relief to states in the designations process under a more limited set of circumstances.

Section 179B explicitly addresses international transport of emissions. This section allows EPA to approve a State Implementation Plan (SIP) for a nonattainment area if: (1) the SIP meets all applicable requirements of the CAA; and (2) the submitting state can satisfactorily demonstrate that "but for emissions emanating from outside of the United States," the area would attain and maintain the applicable NAAQS. EPA has historically evaluated these "but for" demonstrations on a case-by-case basis, based on the individual circumstances and the data provided by the submitting State. These data might include ambient air quality monitoring data, modeling scenarios, emissions inventory data, and meteorological or satellite data. Under proper circumstances, this section would provide relief for a designated nonattainment area from certain fee requirements, reclassification requirements, and attainment and maintenance demonstration requirements. Section 179B does not, however, provide authority to exclude monitoring data influenced by international transport from regulatory determinations related to attainment and nonattainment. Thus, even if EPA approves a section 179B "but for" demonstration for an area, the area would continue to be designated as nonattainment and subject to the applicable requirements, including nonattainment new source review, nonattainment conformity, and other measures prescribed for nonattainment areas by the CAA.

In addition to section 179B, transboundary emissions that affect U.S. air quality may also be addressed by the provisions of the Clean Air Act's section 319(b)(3). For areas affected by exceptional events, whether natural or man-made, section 319(b)(3) provides a mechanism by which data can be excluded from nonattainment determinations. In March 2007, EPA finalized a rule to establish criteria and procedures for use in determining if air quality monitoring data have been influenced by exceptional events. These are events that affect air quality, that are not reasonably preventable or controllable, and that are caused either by human activity that is unlikely to recur at a particular location or by natural events (e.g., dust storms, seismic events, or wildfires). EPA has established a process through regulations to determine whether a given event qualifies for treatment as an exceptional event. EPA's Exceptional Events Rule establishes the procedures and criteria to be used to identify, evaluate, interpret and use monitored air quality data for comparison to the NAAQS in situations where state, local, and Tribal air quality agencies request special treatment because the data have been affected by an exceptional event. The rule also ensures that air quality measurements are properly evaluated and characterized with regard to their causes; identifies reasonable actions that should be taken to address the air quality and public health impacts caused by these types of events; avoids imposing unreasonable planning requirements on state, local, and Tribal air quality agencies related to violations of the NAAQS due to exceptional events; and ensures that the use of air quality data, whether afforded special treatment or not, is subject to full public disclosure and review. Under appropriate circumstances consistent with the Exceptional Events Rule, EPA may exclude data from consideration in determinations regarding the attainment or nonattainment of a given area and related nonattainment area plan requirements.

7) **Given, as EPA recognizes, that there would be many new nonattainment areas, does EPA believe it is realistic to require states to provide recommendations to EPA by January 7, 2011? Is it reasonable to require State Implementation Plans by December 2013?**

   a) **If EPA believes these deadlines are realistic, please explain the basis for that conclusion.**

In the ozone NAAQS reconsideration, EPA proposed an accelerated schedule for states to submit recommendations for area designations for a new primary ozone NAAQS resulting from the reconsideration. Under that schedule, the state recommendations would be due 129 days from promulgation of the NAAQS. If EPA promulgates a new ozone standard on August 31, 2010, this would result in a January 7, 2011, deadline. For a distinct secondary standard resulting from reconsideration, EPA proposed two alternative schedules for submitting recommendations: the same accelerated schedule as for the primary or a 1-year schedule (the maximum time allowable under the CAA). As EPA explained in the proposal, acceleration of the designations process would help limit any delays in health protections associated with the reconsideration of the ozone NAAQS. EPA also indicated that, in a subsequent rulemaking, we intended to propose an accelerated schedule for states to submit state implementation plans (SIPs) for designated nonattainment areas. (EPA has not yet proposed that rule.) EPA received numerous comments from states, state organizations, and others on the proposed accelerated schedules for designations, as well as on the schedule EPA is considering proposing for nonattainment SIP submissions. Many commenters, including some states and state organizations, opposed the accelerated schedules, while others expressed support for the schedules. State commenters raised a variety of concerns regarding the feasibility of meeting the accelerated schedules, including the potential for many new nonattainment areas. EPA is currently evaluating these concerns as the Agency makes its decisions regarding reasonable and appropriate schedules.

8) **Does EPA anticipate requiring separate planning requirements for a seasonal secondary standard if one is adopted as proposed? How does EPA plan to implement this type of secondary standard?**

EPA recognizes that there are significant issues associated with this, especially for those areas that might be designated as nonattainment for the secondary standard only (and not for the primary standard). Until a final decision is made regarding the standards, we won't know how many areas will be in that situation. However, we are currently evaluating how to interpret the requirements of the Clean Air Act as they apply to a secondary standard. We will be addressing implementation of the secondary standard in our upcoming proposed ozone implementation rule.

9) **Has EPA prepared any analyses of the potential employment impacts of the proposed standards on specific sectors of the economy, including the manufacturing and construction sectors? If yes, please provide copies of such analyses.**

EPA did not analyze the potential employment impacts of the proposed standards.

10) **Has EPA prepared any analyses of the potential relocation of production facilities outside the United States as a result of implementation of the proposed standards? If yes, please provide copies of such analyses.**

EPA's economic analysis did not include an assessment of the potential relocation of production facilities outside of the United States as a result of the proposed standards.

11) **Has EPA prepared any analyses of the potential impacts of the proposed standards on small businesses? If yes, please provide copies of such analyses.**

As determined by the U.S. Court of Appeals (D.C. Circuit) in *American Trucking Associations v. EPA* (175F. 3d at 10-44-45), EPA is not required to analyze the potential impacts of the proposed standards on small businesses. Specifically, the court determined that "NAAQS do not have significant impacts upon small entities (including small businesses) because NAAQS themselves impose no regulations upon small entities." Therefore, EPA did not conduct this kind of analysis as part of the ozone reconsideration.

Again, thank you for your letter. If you have further questions, please contact me or your staff may call Diann Frantz in EPA's Office of Congressional and Intergovernmental Relations at (202) 564-3668.

Sincerely,

Gina McCarthy
Assistant Administrator

Attachments

8-hour Ground-level Ozone Concentrations

Based on Monitored Air Quality from 2006 - 2008
Includes only Counties with Monitors

	Does not violate proposed range
	Violates 0.060 parts per million
	Violates 0.065 parts per million
	Violates 0.070 parts per million

State	County	2006 - 2008 Concentrations 3-year average
Alabama	Baldwin	0.077
Alabama	Colbert	0.073
Alabama	Elmore	0.071
Alabama	Etowah	0.071
Alabama	Houston	0.070
Alabama	Jefferson	0.087
Alabama	Madison	0.078
Alabama	Mobile	0.079
Alabama	Montgomery	0.074
Alabama	Morgan	0.076
Alabama	Russell	0.074
Alabama	Shelby	0.088
Alabama	Sumter	0.065
Alabama	Tuscaloosa	0.075
Alaska	Yukon-Koyukuk	0.058
Arizona	Cochise	0.070
Arizona	Coconino	0.070
Arizona	Gila	0.078
Arizona	La Paz	0.074
Arizona	Maricopa	0.081
Arizona	Navajo	0.071
Arizona	Pima	0.074
Arizona	Pinal	0.080
Arizona	Yuma	0.074
Arkansas	Crittenden	0.082
Arkansas	Newton	0.071
Arkansas	Polk	0.074
Arkansas	Pulaski	0.080
Arkansas	Washington	0.060
California	Alameda	0.081
California	Amador	0.086
California	Butte	0.085
California	Calaveras	0.089
California	Colusa	0.069
California	Contra Costa	0.078
California	El Dorado	0.098
California	Fresno	0.101

California	Glenn	0.064
California	Humboldt	0.043
California	Imperial	0.083
California	Inyo	0.091
California	Kern	0.108
California	Kings	0.091
California	Lake	0.062
California	Los Angeles	0.108
California	Madera	0.083
California	Marin	0.050
California	Mariposa	0.088
California	Mendocino	0.058
California	Merced	0.093
California	Monterey	0.060
California	Napa	0.062
California	Nevada	0.092
California	Orange	0.066
California	Placer	0.091
California	Riverside	0.106
California	Sacramento	0.102
California	San Benito	0.080
California	San Bernardino	0.116
California	San Diego	0.093
California	San Francisco	0.047
California	San Joaquin	0.087
California	San Luis Obispo	0.084
California	San Mateo	0.054
California	Santa Barbara	0.073
California	Santa Clara	0.076
California	Santa Cruz	0.062
California	Shasta	0.078
California	Siskiyou	0.064
California	Solano	0.078
California	Sonoma	0.058
California	Stanislaus	0.091
California	Sutter	0.085
California	Tehama	0.085
California	Tulare	0.105
California	Tuolumne	0.087
California	Ventura	0.068
California	Yolo	0.076
Colorado	Adams	0.073
Colorado	Arapahoe	0.072
Colorado	Boulder	0.081
Colorado	Denver	0.073
Colorado	Douglas	0.083
Colorado	El Paso	0.073
Colorado	Jefferson	0.086
Colorado	La Plata	0.071
Colorado	Larimer	0.083
Colorado	Montezuma	0.071
Colorado	Weld	0.076

Connecticut	Fairfield	0.090
Connecticut	Hartford	0.088
Connecticut	Litchfield	0.084
Connecticut	Middlesex	0.088
Connecticut	New Haven	0.089
Connecticut	Tolland	0.087
Delaware	Kent	0.081
Delaware	New Castle	0.083
Delaware	Sussex	0.081
District Of Columbia	District of Columbi	0.087
Florida	Alachua	0.074
Florida	Baker	0.068
Florida	Bay	0.076
Florida	Brevard	0.071
Florida	Broward	0.069
Florida	Collier	0.070
Florida	Columbia	0.070
Florida	Duval	0.075
Florida	Escambia	0.079
Florida	Highlands	0.073
Florida	Hillsborough	0.081
Florida	Holmes	0.071
Florida	Lake	0.074
Florida	Lee	0.069
Florida	Leon	0.072
Florida	Manatee	0.070
Florida	Marion	0.072
Florida	Miami-Dade	0.074
Florida	Orange	0.076
Florida	Osceola	0.072
Florida	Palm Beach	0.068
Florida	Pasco	0.076
Florida	Pinellas	0.072
Florida	Polk	0.075
Florida	Santa Rosa	0.081
Florida	Sarasota	0.077
Florida	Seminole	0.072
Florida	St. Lucie	0.066
Florida	Volusia	0.067
Florida	Wakulla	0.072
Georgia	Bibb	0.081
Georgia	Chatham	0.067
Georgia	Chattooga	0.074
Georgia	Clarke	0.082
Georgia	Cobb	0.086
Georgia	Columbia	0.074
Georgia	Coweta	0.084
Georgia	Dawson	0.077
Georgia	DeKalb	0.093
Georgia	Douglas	0.087
Georgia	Fayette	0.086
Georgia	Fulton	0.091

Georgia	Glynn	0.056
Georgia	Gwinnett	0.069
Georgia	Henry	0.064
Georgia	Murray	0.076
Georgia	Muscogee	0.079
Georgia	Paulding	0.080
Georgia	Richmond	0.069
Georgia	Rockdale	0.068
Georgia	Sumter	0.074
Hawaii	Honolulu	0.038
Idaho	Ada	0.076
Idaho	Kootenai	0.064
Illinois	Champaign	0.065
Illinois	Clark	0.066
Illinois	Cook	0.076
Illinois	DuPage	0.064
Illinois	Effingham	0.069
Illinois	Hamilton	0.069
Illinois	Jersey	0.074
Illinois	Kane	0.066
Illinois	Lake	0.072
Illinois	Macon	0.071
Illinois	Macoupin	0.070
Illinois	Madison	0.078
Illinois	McHenry	0.065
Illinois	McLean	0.071
Illinois	Peoria	0.073
Illinois	Randolph	0.072
Illinois	Rock Island	0.066
Illinois	Saint Clair	0.073
Illinois	Sangamon	0.066
Illinois	Will	0.066
Illinois	Winnebago	0.065
Indiana	Allen	0.073
Indiana	Boone	0.079
Indiana	Carroll	0.072
Indiana	Clark	0.081
Indiana	Delaware	0.071
Indiana	Elkhart	0.072
Indiana	Floyd	0.076
Indiana	Greene	0.077
Indiana	Hamilton	0.078
Indiana	Hancock	0.077
Indiana	Hendricks	0.073
Indiana	Huntington	0.070
Indiana	Jackson	0.074
Indiana	Johnson	0.076
Indiana	Lake	0.077
Indiana	LaPorte	0.074
Indiana	Madison	0.072
Indiana	Marion	0.078
Indiana	Morgan	0.077

Indiana	Perry	0.077
Indiana	Porter	0.074
Indiana	Posey	0.069
Indiana	Shelby	0.075
Indiana	St. Joseph	0.074
Indiana	Vanderburgh	0.080
Indiana	Vigo	0.070
Indiana	Warrick	0.077
Iowa	Bremer	0.066
Iowa	Clinton	0.067
Iowa	Harrison	0.068
Iowa	Linn	0.068
Iowa	Montgomery	0.066
Iowa	Palo Alto	0.058
Iowa	Scott	0.065
Iowa	Story	0.064
Iowa	Van Buren	0.066
Iowa	Warren	0.064
Kansas	Johnson	0.070
Kansas	Leavenworth	0.073
Kansas	Linn	0.071
Kansas	Sedgwick	0.067
Kansas	Sumner	0.073
Kansas	Trego	0.069
Kansas	Wyandotte	0.072
Kentucky	Bell	0.069
Kentucky	Boone	0.071
Kentucky	Boyd	0.075
Kentucky	Bullitt	0.073
Kentucky	Carter	0.070
Kentucky	Christian	0.078
Kentucky	Daviess	0.078
Kentucky	Edmonson	0.074
Kentucky	Fayette	0.072
Kentucky	Greenup	0.077
Kentucky	Hancock	0.076
Kentucky	Hardin	0.077
Kentucky	Henderson	0.077
Kentucky	Jefferson	0.079
Kentucky	Jessamine	0.074
Kentucky	Kenton	0.078
Kentucky	Livingston	0.071
Kentucky	McCracken	0.075
Kentucky	Oldham	0.081
Kentucky	Perry	0.074
Kentucky	Pike	0.071
Kentucky	Pulaski	0.069
Kentucky	Simpson	0.076
Kentucky	Trigg	0.077
Kentucky	Warren	0.071
Louisiana	Ascension	0.083
Louisiana	Bossier	0.074

Louisiana	Caddo	0.076
Louisiana	Calcasieu	0.076
Louisiana	East Baton Rouge	0.091
Louisiana	Iberville	0.081
Louisiana	Jefferson	0.079
Louisiana	Lafayette	0.078
Louisiana	Lafourche	0.077
Louisiana	Livingston	0.078
Louisiana	Ouachita	0.066
Louisiana	Pointe Coupee	0.083
Louisiana	St. Bernard	0.073
Louisiana	St. Charles	0.075
Louisiana	St. James	0.076
Louisiana	St. John the Baptis	0.078
Louisiana	West Baton Rouge	0.078
Maine	Androscoggin	0.072
Maine	Aroostook	0.057
Maine	Cumberland	0.074
Maine	Hancock	0.080
Maine	Kennebec	0.071
Maine	Knox	0.072
Maine	Oxford	0.063
Maine	Penobscot	0.067
Maine	Washington	0.065
Maine	York	0.076
Maryland	Anne Arundel	0.087
Maryland	Baltimore	0.085
Maryland	Baltimore (City)	0.067
Maryland	Calvert	0.080
Maryland	Carroll	0.083
Maryland	Cecil	0.091
Maryland	Charles	0.082
Maryland	Frederick	0.082
Maryland	Garrett	0.074
Maryland	Harford	0.091
Maryland	Kent	0.083
Maryland	Montgomery	0.084
Maryland	Prince George's	0.087
Maryland	Washington	0.078
Massachusetts	Barnstable	0.080
Massachusetts	Berkshire	0.076
Massachusetts	Bristol	0.080
Massachusetts	Dukes	0.083
Massachusetts	Essex	0.081
Massachusetts	Hampden	0.089
Massachusetts	Hampshire	0.084
Massachusetts	Middlesex	0.078
Massachusetts	Norfolk	0.082
Massachusetts	Suffolk	0.074
Massachusetts	Worcester	0.082
Michigan	Allegan	0.086
Michigan	Benzie	0.076

Michigan	Berrien	0.078
Michigan	Cass	0.076
Michigan	Clinton	0.073
Michigan	Genesee	0.076
Michigan	Huron	0.074
Michigan	Ingham	0.074
Michigan	Kalamazoo	0.073
Michigan	Kent	0.078
Michigan	Leelanau	0.071
Michigan	Lenawee	0.076
Michigan	Macomb	0.081
Michigan	Manistee	0.077
Michigan	Mason	0.076
Michigan	Missaukee	0.072
Michigan	Muskegon	0.083
Michigan	Oakland	0.077
Michigan	Ottawa	0.079
Michigan	Schoolcraft	0.075
Michigan	St. Clair	0.078
Michigan	Washtenaw	0.074
Michigan	Wayne	0.082
Minnesota	Anoka	0.066
Minnesota	**Becker**	**0.062**
Minnesota	Crow Wing	0.066
Minnesota	Goodhue	0.069
Minnesota	**Lake**	**0.062**
Minnesota	**Lyon**	**0.063**
Minnesota	**Mille Lacs**	**0.065**
Minnesota	**Olmsted**	**0.064**
Minnesota	**Saint Louis**	**0.062**
Minnesota	Scott	0.066
Minnesota	Washington	0.069
Minnesota	Wright	0.069
Mississippi	Adams	0.072
Mississippi	Bolivar	0.074
Mississippi	DeSoto	0.082
Mississippi	Harrison	0.081
Mississippi	Hinds	0.072
Mississippi	Jackson	0.079
Mississippi	Lauderdale	0.072
Mississippi	Lee	0.072
Missouri	Cass	0.072
Missouri	Cedar	0.072
Missouri	Clay	0.082
Missouri	Clinton	0.079
Missouri	Greene	0.074
Missouri	Lincoln	0.081
Missouri	Monroe	0.072
Missouri	Perry	0.077
Missouri	Saint Charles	0.085
Missouri	Saint Louis	0.082
Missouri	Sainte Genevieve	0.079

Missouri	St. Louis City	0.081
Montana	Flathead	0.057
Nebraska	Douglas	0.065
Nebraska	Lancaster	0.054
Nevada	Churchill	0.068
Nevada	Clark	0.082
Nevada	Washoe	0.074
Nevada	White Pine	0.073
New Hampshire	Belknap	0.071
New Hampshire	Cheshire	0.069
New Hampshire	Coos	0.078
New Hampshire	Grafton	0.068
New Hampshire	Hillsborough	0.078
New Hampshire	Merrimack	0.075
New Hampshire	Rockingham	0.079
New Hampshire	Sullivan	0.069
New Jersey	Camden	0.087
New Jersey	Cumberland	0.082
New Jersey	Gloucester	0.087
New Jersey	Hudson	0.086
New Jersey	Hunterdon	0.087
New Jersey	Mercer	0.086
New Jersey	Middlesex	0.088
New Jersey	Monmouth	0.086
New Jersey	Morris	0.086
New Jersey	Ocean	0.087
New Jersey	Passaic	0.078
New Mexico	Bernalillo	0.071
New Mexico	Dona Ana	0.077
New Mexico	Eddy	0.070
New Mexico	Grant	0.064
New Mexico	Lea	0.069
New Mexico	Luna	0.058
New Mexico	San Juan	0.076
New Mexico	Sandoval	0.070
New York	Albany	0.073
New York	Bronx	0.077
New York	Chautauqua	0.084
New York	Chemung	0.068
New York	Dutchess	0.074
New York	Erie	0.081
New York	Essex	0.077
New York	Franklin	0.067
New York	Hamilton	0.071
New York	Herkimer	0.070
New York	Jefferson	0.075
New York	Madison	0.073
New York	Monroe	0.080
New York	Niagara	0.077
New York	Oneida	0.067
New York	Onondaga	0.074
New York	Orange	0.080

New York	Oswego	0.074
New York	Putnam	0.079
New York	Queens	0.077
New York	Rensselaer	0.075
New York	Richmond	0.079
New York	Saratoga	0.077
New York	Schenectady	0.066
New York	Steuben	0.071
New York	Suffolk	0.090
New York	Ulster	0.072
New York	Wayne	0.072
New York	Westchester	0.086
North Carolina	Alexander	0.078
North Carolina	Avery	0.068
North Carolina	Buncombe	0.072
North Carolina	Caldwell	0.075
North Carolina	Caswell	0.079
North Carolina	Chatham	0.072
North Carolina	Cumberland	0.077
North Carolina	Davie	0.082
North Carolina	Edgecombe	0.076
North Carolina	Forsyth	0.082
North Carolina	Franklin	0.077
North Carolina	Graham	0.078
North Carolina	Granville	0.080
North Carolina	Guilford	0.082
North Carolina	Haywood	0.079
North Carolina	Johnston	0.075
North Carolina	Lenoir	0.074
North Carolina	Lincoln	0.082
North Carolina	Martin	0.073
North Carolina	Mecklenburg	0.094
North Carolina	New Hanover	0.069
North Carolina	Person	0.077
North Carolina	Rockingham	0.080
North Carolina	Rowan	0.089
North Carolina	Swain	0.065
North Carolina	Union	0.081
North Carolina	Wake	0.080
North Carolina	Yancey	0.077
North Dakota	Billings	0.064
North Dakota	Burke	0.059
North Dakota	Burleigh	0.060
North Dakota	Cass	0.058
North Dakota	Dunn	0.060
North Dakota	McKenzie	0.064
North Dakota	Mercer	0.062
North Dakota	Oliver	0.061
Ohio	Allen	0.073
Ohio	Ashtabula	0.084
Ohio	Butler	0.082
Ohio	Clark	0.076

Ohio	Clermont	0.078
Ohio	Clinton	0.080
Ohio	Cuyahoga	0.081
Ohio	Delaware	0.077
Ohio	Franklin	0.084
Ohio	Geauga	0.079
Ohio	Greene	0.077
Ohio	Hamilton	0.083
Ohio	Jefferson	0.077
Ohio	Knox	0.076
Ohio	Lake	0.078
Ohio	Lawrence	0.077
Ohio	Licking	0.075
Ohio	Lorain	0.078
Ohio	Lucas	0.076
Ohio	Madison	0.077
Ohio	Mahoning	0.075
Ohio	Medina	0.072
Ohio	Miami	0.072
Ohio	Montgomery	0.074
Ohio	Portage	0.074
Ohio	Preble	0.071
Ohio	Stark	0.080
Ohio	Summit	0.082
Ohio	Trumbull	0.081
Ohio	Warren	0.085
Ohio	Washington	0.082
Ohio	Wood	0.075
Oklahoma	Adair	0.073
Oklahoma	Caddo	0.062
Oklahoma	Canadian	0.074
Oklahoma	Cherokee	0.073
Oklahoma	Cleveland	0.073
Oklahoma	Creek	0.075
Oklahoma	Dewey	0.070
Oklahoma	Kay	0.075
Oklahoma	Mayes	0.073
Oklahoma	McClain	0.070
Oklahoma	Oklahoma	0.079
Oklahoma	Ottawa	0.073
Oklahoma	Pittsburg	0.072
Oklahoma	Sequoyah	0.076
Oklahoma	Tulsa	0.079
Oregon	Clackamas	0.065
Oregon	Columbia	0.059
Oregon	Jackson	0.068
Oregon	Lane	0.065
Oregon	Marion	0.067
Oregon	Multnomah	0.060
Pennsylvania	Adams	0.077
Pennsylvania	Allegheny	0.088
Pennsylvania	Armstrong	0.089

Pennsylvania	Beaver	0.078
Pennsylvania	Blair	0.072
Pennsylvania	Bucks	0.093
Pennsylvania	Cambria	0.071
Pennsylvania	Centre	0.075
Pennsylvania	Chester	0.083
Pennsylvania	Clearfield	0.074
Pennsylvania	Dauphin	0.079
Pennsylvania	Delaware	0.083
Pennsylvania	Erie	0.078
Pennsylvania	Franklin	0.072
Pennsylvania	Greene	0.076
Pennsylvania	Indiana	0.076
Pennsylvania	Lackawanna	0.075
Pennsylvania	Lancaster	0.083
Pennsylvania	Lawrence	0.071
Pennsylvania	Lehigh	0.080
Pennsylvania	Luzerne	0.075
Pennsylvania	Lycoming	0.077
Pennsylvania	Mercer	0.080
Pennsylvania	Monroe	0.076
Pennsylvania	Montgomery	0.084
Pennsylvania	Northampton	0.079
Pennsylvania	Perry	0.077
Pennsylvania	Philadelphia	0.089
Pennsylvania	Tioga	0.073
Pennsylvania	Washington	0.076
Pennsylvania	Westmoreland	0.076
Pennsylvania	York	0.081
Puerto Rico	Catano	0.033
Rhode Island	Kent	0.081
Rhode Island	Providence	0.082
Rhode Island	Washington	0.082
South Carolina	Abbeville	0.079
South Carolina	Aiken	0.077
South Carolina	Berkeley	0.064
South Carolina	Charleston	0.073
South Carolina	Cherokee	0.074
South Carolina	Chesterfield	0.073
South Carolina	Colleton	0.073
South Carolina	Darlington	0.075
South Carolina	Edgefield	0.071
South Carolina	Oconee	0.071
South Carolina	Pickens	0.081
South Carolina	Richland	0.080
South Carolina	Spartanburg	0.084
South Carolina	York	0.078
South Dakota	Custer	0.067
Tennessee	Anderson	0.078
Tennessee	Blount	0.085
Tennessee	Davidson	0.077
Tennessee	Hamilton	0.084

Tennessee	Jefferson	0.091
Tennessee	Knox	0.088
Tennessee	Loudon	0.082
Tennessee	Meigs	0.079
Tennessee	Rutherford	0.078
Tennessee	Sevier	0.084
Tennessee	Shelby	0.083
Tennessee	Sullivan	0.082
Tennessee	Sumner	0.084
Tennessee	Williamson	0.075
Tennessee	Wilson	0.080
Texas	Bexar	0.078
Texas	Brazoria	0.085
Texas	Brewster	0.066
Texas	**Cameron**	**0.064**
Texas	Collin	0.083
Texas	Dallas	0.082
Texas	Denton	0.081
Texas	El Paso	0.078
Texas	Ellis	0.076
Texas	Gregg	0.079
Texas	Harris	0.091
Texas	Harrison	0.072
Texas	Hays	0.068
Texas	**Hidalgo**	**0.064**
Texas	Hood	0.081
Texas	Hunt	0.070
Texas	Jefferson	0.081
Texas	Johnson	0.080
Texas	Kaufman	0.073
Texas	Montgomery	0.081
Texas	Nueces	0.071
Texas	Orange	0.072
Texas	Parker	0.085
Texas	Rockwall	0.075
Texas	Smith	0.077
Texas	Tarrant	0.089
Texas	Travis	0.077
Texas	Victoria	0.065
Texas	**Webb**	**0.058**
Utah	Box Elder	0.076
Utah	Cache	0.071
Utah	Davis	0.081
Utah	Salt Lake	0.082
Utah	San Juan	0.071
Utah	Tooele	0.078
Utah	Utah	0.078
Utah	Washington	0.072
Utah	Weber	0.080
Vermont	Bennington	0.071
Vermont	Chittenden	0.071
Virginia	Alexandria City	0.081

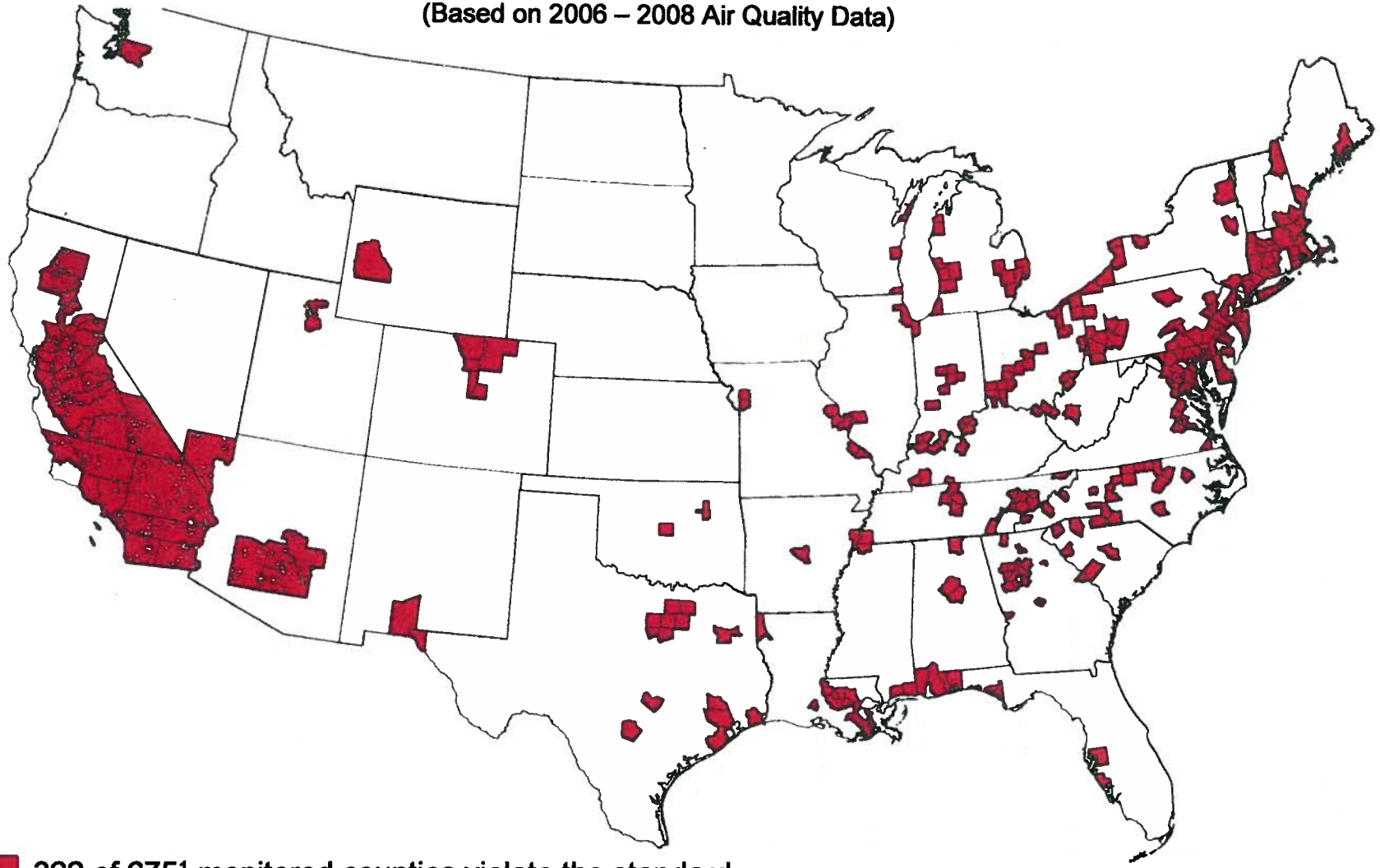
Virginia	Arlington	0.080
Virginia	Caroline	0.081
Virginia	Charles	0.083
Virginia	Chesterfield	0.078
Virginia	Fairfax	0.087
Virginia	Fauquier	0.071
Virginia	Frederick	0.073
Virginia	Hampton City	0.077
Virginia	Hanover	0.080
Virginia	Henrico	0.086
Virginia	Loudoun	0.083
Virginia	Madison	0.076
Virginia	Page	0.070
Virginia	Prince William	0.079
Virginia	Roanoke	0.074
Virginia	Rockbridge	0.067
Virginia	Stafford	0.082
Virginia	Suffolk City	0.077
Virginia	Wythe	0.071
Washington	Clallam	0.052
Washington	Clark	0.062
Washington	King	0.077
Washington	Pierce	0.070
Washington	Skagit	0.047
Washington	Spokane	0.064
Washington	Thurston	0.061
West Virginia	Berkeley	0.074
West Virginia	Cabell	0.080
West Virginia	Greenbrier	0.071
West Virginia	Hancock	0.078
West Virginia	Kanawha	0.078
West Virginia	Monongalia	0.074
West Virginia	Ohio	0.077
West Virginia	Wood	0.078
Wisconsin	Ashland	0.062
Wisconsin	Brown	0.070
Wisconsin	Columbia	0.069
Wisconsin	Dane	0.070
Wisconsin	Dodge	0.069
Wisconsin	Door	0.080
Wisconsin	Florence	0.065
Wisconsin	Fond du Lac	0.067
Wisconsin	Forest	0.068
Wisconsin	Jefferson	0.070
Wisconsin	Kenosha	0.079
Wisconsin	Kewaunee	0.076
Wisconsin	Manitowoc	0.076
Wisconsin	Marathon	0.067
Wisconsin	Milwaukee	0.075
Wisconsin	Oneida	0.066
Wisconsin	Outagamie	0.069
Wisconsin	Ozaukee	0.074

Wisconsin	Racine	0.071
Wisconsin	Rock	0.070
Wisconsin	**Sauk**	**0.065**
Wisconsin	Sheboygan	0.082
Wisconsin	St. Croix	0.068
Wisconsin	Vernon	0.067
Wisconsin	Vilas	0.067
Wisconsin	Walworth	0.070
Wisconsin	Washington	0.066
Wisconsin	Waukesha	0.066
Wyoming	Campbell	0.073
Wyoming	Sublette	0.080
Wyoming	**Sweetwater**	**0.065**
Wyoming	Teton	0.066

Notes:

1. EPA will not designate areas as nonattainment on these data, but likely on 2008 - 2010 data which we expect to show improved air quality.
2. Monitored air quality data is available from the AQS system at http://www.epa.gov/ttn/airsaqs/.

Counties With Monitors Violating the March 2008 Ground-Level Ozone Standards
0.075 parts per million
(Based on 2006 – 2008 Air Quality Data)



322 of 675[1] monitored counties violate the standard

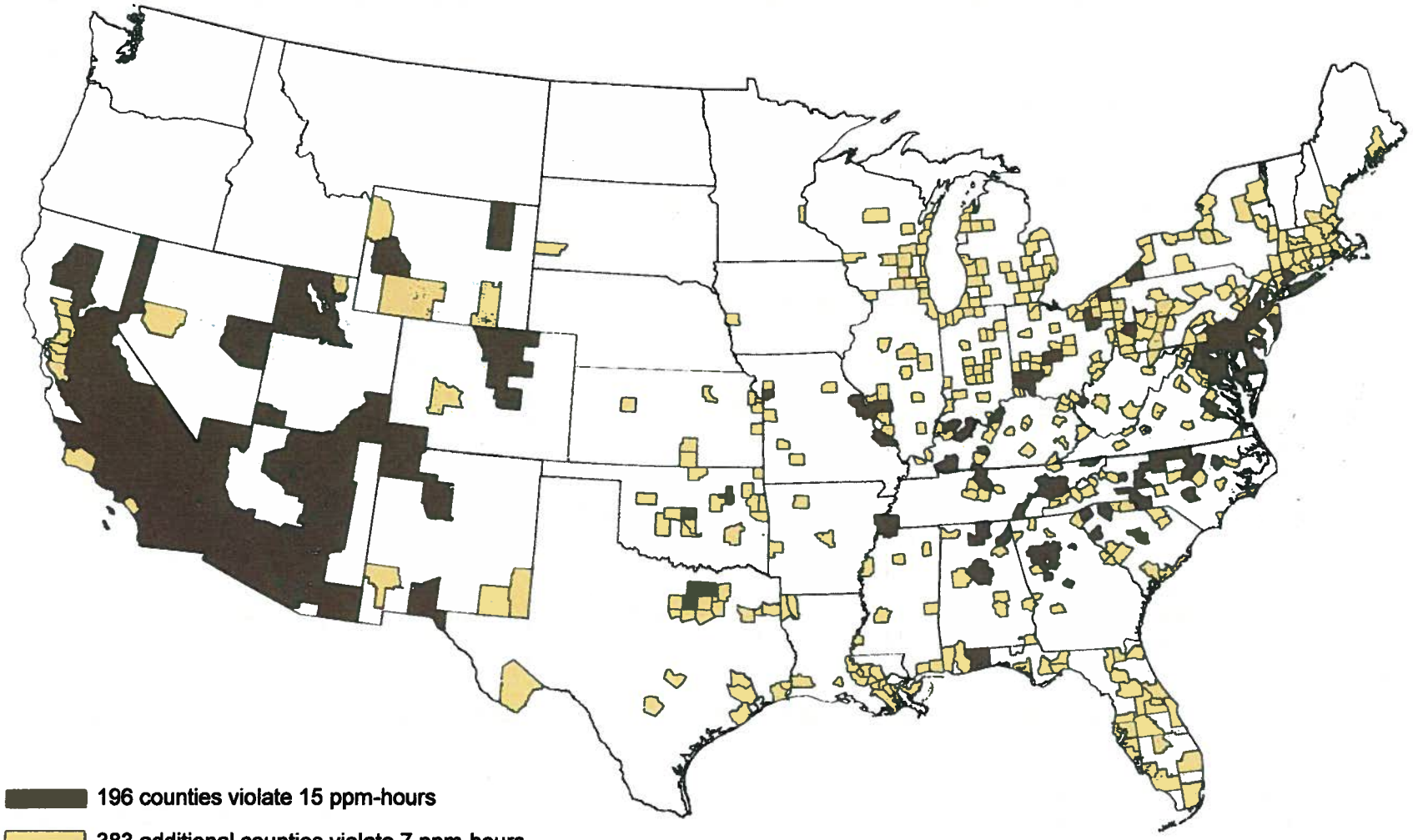
Notes:

1. Counties with at least one monitor with complete data for 2006 – 2008
2. To determine compliance with the March 2008 ozone standards, the 3-year average is truncated to three decimal places.

Counties With Monitors Violating Secondary Seasonal Ground-Level Ozone Standards
7 – 15 parts per million - hours

(Based on 2006 – 2008 Air Quality Data)

EPA will not designate areas as nonattainment on these data, but likely on 2008 – 2010 data which are expected to show improved air quality.

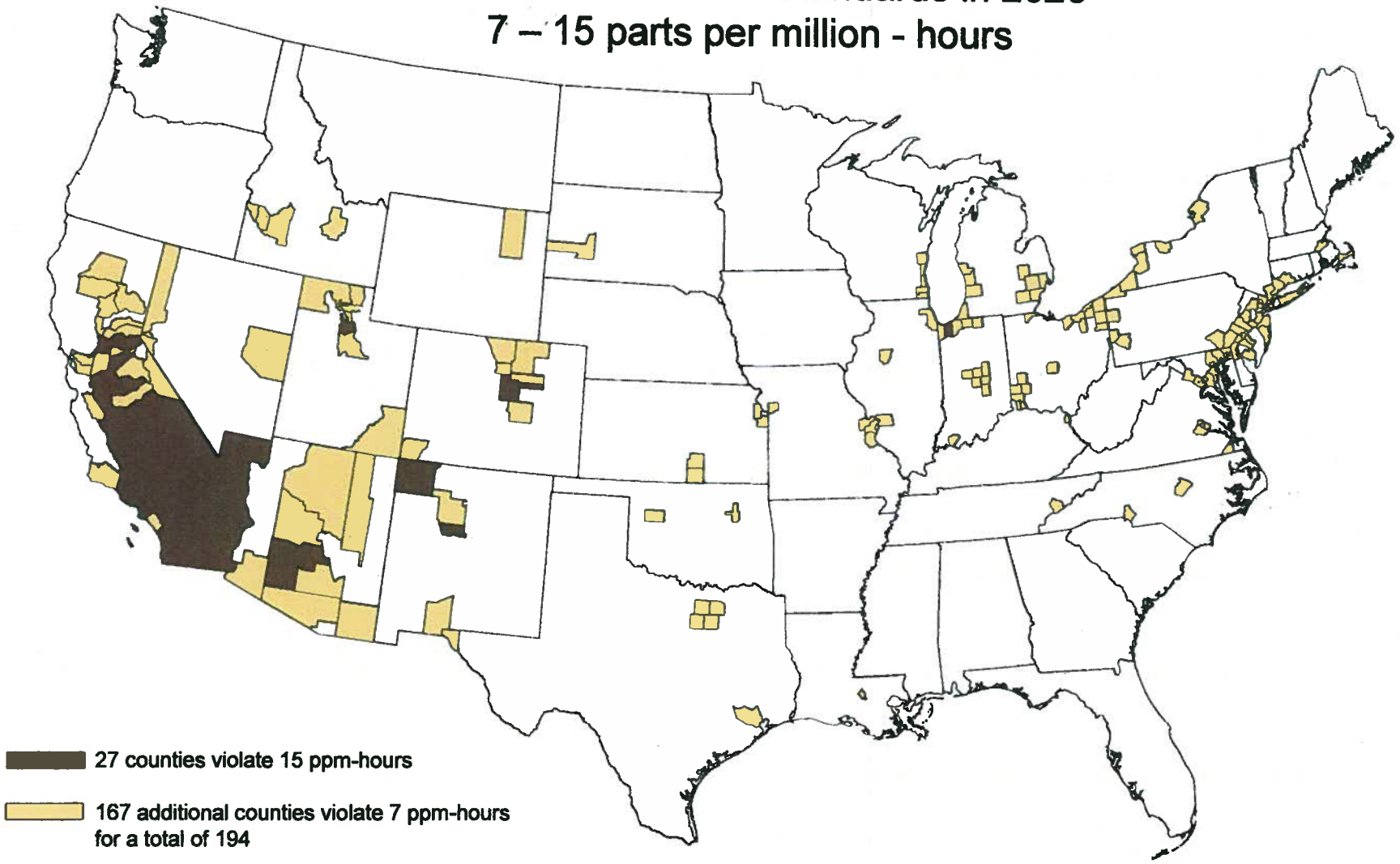


196 counties violate 15 ppm-hours

383 additional counties violate 7 ppm-hours
for a total of 579

No monitored counties outside the continental U.S. violate.

Counties With Monitors Projected to Violate the Secondary Seasonal Ground-level Ozone Standards in 2020
7 – 15 parts per million - hours



Notes:

1. The modeled emissions in 2020 reflect the expected emissions reductions from federal programs by 2020 including: the Clean Air Interstate Rule, the Clean Air Mercury Rule, the Clean Air Visibility Rule, the Clean Air Nonroad Diesel Rule, the Light-Duty Vehicle Tier 2 Rule, the Heavy Duty Diesel Rule, the proposed rules for Locomotive and Marine Vessels and for Small Spark-Ignition Engines, and an estimate of State-level mobile and stationary source controls that were projected to be needed to attain pre-existing PM 2.5 and ozone standards.
2. Controls applied are illustrative. States may choose to apply different control strategies for implementation.
3. EPA did not model future violations outside the continental U.S.

Counties Projected to Violate Primary 8-hour Ground-Level Ozone Standard in 2020

(Model projections for 2020)
(Only includes counties with monitors)

	Not projected to violate proposed range
	Projected to violate 0.060 parts per million
	Projected to violate 0.065 parts per million
	Projected to violate 0.070 parts per million

State	County
Alabama	Baldwin
Alabama	Clay
Alabama	Elmore
Alabama	Etowah
Alabama	Jefferson
Alabama	Lawrence
Alabama	Madison
Alabama	Mobile
Alabama	Montgomery
Alabama	Morgan
Alabama	Shelby
Alabama	Sumter
Alabama	Tuscaloosa
Arizona	Cochise
Arizona	Coconino
Arizona	Maricopa
Arizona	Navajo
Arizona	Pima
Arizona	Pinal
Arizona	Yavapai
Arkansas	Crittenden
Arkansas	Montgomery
Arkansas	Newton
Arkansas	Pulaski
California	Alameda
California	Amador
California	Butte
California	Calaveras
California	Colusa
California	Contra Costa
California	El Dorado
California	Fresno
California	Glenn
California	Imperial
California	Inyo

California	Kern
California	Kings
California	Lake
California	Los Angeles
California	Madera
California	Marin
California	Mariposa
California	Mendocino
California	Merced
California	Monterey
California	Napa
California	Nevada
California	Orange
California	Placer
California	Riverside
California	Sacramento
California	San Benito
California	San Bernardino
California	San Diego
California	San Francisco
California	San Joaquin
California	San Luis Obispo
California	San Mateo
California	Santa Barbara
California	Santa Clara
California	Santa Cruz
California	Shasta
California	Solano
California	Sonoma
California	Stanislaus
California	Sutter
California	Tehama
California	Tulare
California	Tuolumne
California	Ventura
California	Yolo
Colorado	Adams
Colorado	Arapahoe
Colorado	Boulder
Colorado	Denver
Colorado	Douglas
Colorado	El Paso
Colorado	Jefferson
Colorado	La Plata
Colorado	Larimer
Colorado	Montezuma
Colorado	Weld
Connecticut	Fairfield
Connecticut	Hartford
Connecticut	Litchfield
Connecticut	Middlesex
Connecticut	New Haven

Connecticut	New London
Connecticut	Tolland
D.C.	Washington
Delaware	Kent
Delaware	New Castle
Delaware	Sussex
Florida	Alachua
Florida	Baker
Florida	Bay
Florida	Brevard
Florida	Broward
Florida	Collier
Florida	Columbia
Florida	Duval
Florida	Escambia
Florida	Highlands
Florida	Hillsborough
Florida	Holmes
Florida	Lake
Florida	Lee
Florida	Leon
Florida	Manatee
Florida	Marion
Florida	Miami-Dade
Florida	Orange
Florida	Osceola
Florida	Palm Beach
Florida	Pasco
Florida	Pinellas
Florida	Polk
Florida	Santa Rosa
Florida	Sarasota
Florida	Seminole
Florida	St Lucie
Florida	Volusia
Florida	Wakulla
Georgia	Bibb
Georgia	Chatham
Georgia	Cherokee
Georgia	Clarke
Georgia	Cobb
Georgia	Coweta
Georgia	Dawson
Georgia	De Kalb
Georgia	Douglas
Georgia	Fayette
Georgia	Fulton
Georgia	Glynn
Georgia	Gwinnett
Georgia	Henry
Georgia	Murray
Georgia	Muscogee

Georgia	Paulding
Georgia	Richmond
Georgia	Rockdale
Georgia	Sumter
Idaho	Ada
Idaho	Butte
Idaho	Canyon
Idaho	Elmore
Illinois	Adams
Illinois	Champaign
Illinois	Clark
Illinois	Cook
Illinois	Du Page
Illinois	Effingham
Illinois	Hamilton
Illinois	Jersey
Illinois	Kane
Illinois	Lake
Illinois	Macon
Illinois	Macoupin
Illinois	Madison
Illinois	McHenry
Illinois	McLean
Illinois	Peoria
Illinois	Randolph
Illinois	Rock Island
Illinois	Sangamon
Illinois	St Clair
Illinois	Will
Illinois	Winnebago
Indiana	Allen
Indiana	Boone
Indiana	Carroll
Indiana	Clark
Indiana	Delaware
Indiana	Elkhart
Indiana	Floyd
Indiana	Gibson
Indiana	Greene
Indiana	Hamilton
Indiana	Hancock
Indiana	Hendricks
Indiana	Huntington
Indiana	Jackson
Indiana	Johnson
Indiana	La Porte
Indiana	Lake
Indiana	Madison
Indiana	Marion
Indiana	Morgan
Indiana	Porter
Indiana	Posey

Indiana	Shelby
Indiana	St Joseph
Indiana	Vanderburgh
Indiana	Vigo
Indiana	Warrick
Iowa	Bremer
Iowa	Clinton
Iowa	Harrison
Iowa	Linn
Iowa	Montgomery
Iowa	Palo Alto
Iowa	Polk
Iowa	Scott
Iowa	Story
Iowa	Van Buren
Iowa	Warren
Kansas	Linn
Kansas	Sedgwick
Kansas	Sumner
Kansas	Trego
Kansas	Wyandotte
Kentucky	Bell
Kentucky	Boone
Kentucky	Boyd
Kentucky	Bullitt
Kentucky	Campbell
Kentucky	Carter
Kentucky	Christian
Kentucky	Daviess
Kentucky	Edmonson
Kentucky	Fayette
Kentucky	Graves
Kentucky	Greenup
Kentucky	Hancock
Kentucky	Hardin
Kentucky	Henderson
Kentucky	Jefferson
Kentucky	Jessamine
Kentucky	Kenton
Kentucky	Livingston
Kentucky	McCracken
Kentucky	McLean
Kentucky	Oldham
Kentucky	Perry
Kentucky	Pike
Kentucky	Pulaski
Kentucky	Scott
Kentucky	Simpson
Kentucky	Trigg
Kentucky	Warren
Louisiana	Ascension
Louisiana	Beauregard

Louisiana	Bossier
Louisiana	Caddo
Louisiana	Calcasieu
Louisiana	East Baton Rouge
Louisiana	Grant
Louisiana	Iberville
Louisiana	Jefferson
Louisiana	Lafayette
Louisiana	Lafourche
Louisiana	Livingston
Louisiana	Orleans
Louisiana	Ouachita
Louisiana	Pointe Coupee
Louisiana	St Bernard
Louisiana	St Charles
Louisiana	St James
Louisiana	St John The Baptis
Louisiana	St Mary
Louisiana	West Baton Rouge
Maine	Cumberland
Maine	Hancock
Maine	Kennebec
Maine	Knox
Maine	Oxford
Maine	Penobscot
Maine	Sagadahoc
Maine	York
Maryland	Anne Arundel
Maryland	Baltimore
Maryland	Carroll
Maryland	Cecil
Maryland	Charles
Maryland	Frederick
Maryland	Harford
Maryland	Kent
Maryland	Montgomery
Maryland	Prince Georges
Maryland	Washington
Massachusetts	Barnstable
Massachusetts	Berkshire
Massachusetts	Bristol
Massachusetts	Essex
Massachusetts	Hampden
Massachusetts	Hampshire
Massachusetts	Middlesex
Massachusetts	Norfolk
Massachusetts	Suffolk
Massachusetts	Worcester
Michigan	Allegan
Michigan	Benzie
Michigan	Berrien
Michigan	Cass

Michigan	Clinton
Michigan	Genesee
Michigan	Huron
Michigan	Ingham
Michigan	Kalamazoo
Michigan	Kent
Michigan	Lenawee
Michigan	Macomb
Michigan	Mason
Michigan	Missaukee
Michigan	Muskegon
Michigan	Oakland
Michigan	Ottawa
Michigan	Schoolcraft
Michigan	St Clair
Michigan	Washtenaw
Michigan	Wayne
Minnesota	St Louis
Mississippi	Adams
Mississippi	Bolivar
Mississippi	De Soto
Mississippi	Hancock
Mississippi	Harrison
Mississippi	Hinds
Mississippi	Jackson
Mississippi	Lauderdale
Mississippi	Lee
Mississippi	Madison
Mississippi	Warren
Missouri	Cass
Missouri	Cedar
Missouri	Clay
Missouri	Greene
Missouri	Jefferson
Missouri	Monroe
Missouri	Platte
Missouri	St Charles
Missouri	St Louis
Missouri	St Louis City
Missouri	Ste Genevieve
Montana	Flathead
Nebraska	Douglas
Nebraska	Lancaster
Nevada	Carson City
Nevada	Clark
Nevada	Douglas
Nevada	Washoe
Nevada	White Pine
New Hampshire	Belknap
New Hampshire	Carroll
New Hampshire	Cheshire
New Hampshire	Grafton

New Hampshire	Hillsborough
New Hampshire	Merrimack
New Hampshire	Rockingham
New Hampshire	Strafford
New Hampshire	Sullivan
New Jersey	Atlantic
New Jersey	Bergen
New Jersey	Camden
New Jersey	Cumberland
New Jersey	Essex
New Jersey	Gloucester
New Jersey	Hudson
New Jersey	Hunterdon
New Jersey	Mercer
New Jersey	Middlesex
New Jersey	Monmouth
New Jersey	Morris
New Jersey	Ocean
New Jersey	Passaic
New Mexico	Bernalillo
New Mexico	Dona Ana
New Mexico	Eddy
New Mexico	San Juan
New Mexico	Sandoval
New Mexico	Valencia
New York	Albany
New York	Bronx
New York	Chautauqua
New York	Chemung
New York	Dutchess
New York	Erie
New York	Essex
New York	Hamilton
New York	Herkimer
New York	Jefferson
New York	Madison
New York	Monroe
New York	Niagara
New York	Oneida
New York	Onondaga
New York	Orange
New York	Oswego
New York	Putnam
New York	Queens
New York	Rensselaer
New York	Richmond
New York	Saratoga
New York	Schenectady
New York	Suffolk
New York	Ulster
New York	Wayne
New York	Westchester

North Carolina	Alexander
North Carolina	Avery
North Carolina	Buncombe
North Carolina	Caldwell
North Carolina	Caswell
North Carolina	Chatham
North Carolina	Cumberland
North Carolina	Davie
North Carolina	Duplin
North Carolina	Durham
North Carolina	Edgecombe
North Carolina	Forsyth
North Carolina	Franklin
North Carolina	Granville
North Carolina	Guilford
North Carolina	Haywood
North Carolina	Jackson
North Carolina	Johnston
North Carolina	Lenoir
North Carolina	Lincoln
North Carolina	Martin
North Carolina	Mecklenburg
North Carolina	New Hanover
North Carolina	Northampton
North Carolina	Person
North Carolina	Pitt
North Carolina	Randolph
North Carolina	Rockingham
North Carolina	Rowan
North Carolina	Swain
North Carolina	Union
North Carolina	Wake
North Carolina	Yancey
North Dakota	Billings
North Dakota	Cass
North Dakota	Dunn
North Dakota	McKenzie
North Dakota	Mercer
North Dakota	Oliver
Ohio	Allen
Ohio	Ashtabula
Ohio	Butler
Ohio	Clark
Ohio	Clermont
Ohio	Clinton
Ohio	Cuyahoga
Ohio	Delaware
Ohio	Franklin
Ohio	Geauga
Ohio	Greene
Ohio	Hamilton
Ohio	Jefferson

Ohio	Knox
Ohio	Lake
Ohio	Lawrence
Ohio	Licking
Ohio	Lorain
Ohio	Lucas
Ohio	Madison
Ohio	Mahoning
Ohio	Medina
Ohio	Miami
Ohio	Montgomery
Ohio	Portage
Ohio	Preble
Ohio	Stark
Ohio	Summit
Ohio	Trumbull
Ohio	Warren
Ohio	Washington
Ohio	Wood
Oklahoma	Canadian
Oklahoma	Cleveland
Oklahoma	Comanche
Oklahoma	Dewey
Oklahoma	Kay
Oklahoma	Mc Clain
Oklahoma	Oklahoma
Oklahoma	Ottawa
Oklahoma	Pittsburg
Oklahoma	Tulsa
Oregon	Clackamas
Oregon	Columbia
Oregon	Jackson
Oregon	Lane
Oregon	Marion
Pennsylvania	Adams
Pennsylvania	Allegheny
Pennsylvania	Armstrong
Pennsylvania	Beaver
Pennsylvania	Berks
Pennsylvania	Blair
Pennsylvania	Bucks
Pennsylvania	Cambria
Pennsylvania	Centre
Pennsylvania	Chester
Pennsylvania	Clearfield
Pennsylvania	Dauphin
Pennsylvania	Delaware
Pennsylvania	Erie
Pennsylvania	Franklin
Pennsylvania	Greene
Pennsylvania	Lackawanna
Pennsylvania	Lancaster

Pennsylvania	Lawrence
Pennsylvania	Lehigh
Pennsylvania	Luzerne
Pennsylvania	Lycoming
Pennsylvania	Mercer
Pennsylvania	Montgomery
Pennsylvania	Northampton
Pennsylvania	Perry
Pennsylvania	Philadelphia
Pennsylvania	Tioga
Pennsylvania	Washington
Pennsylvania	Westmoreland
Pennsylvania	York
Rhode Island	Kent
Rhode Island	Providence
Rhode Island	Washington
South Carolina	Abbeville
South Carolina	Aiken
South Carolina	Anderson
South Carolina	Barnwell
South Carolina	Berkeley
South Carolina	Charleston
South Carolina	Cherokee
South Carolina	Chester
South Carolina	Chesterfield
South Carolina	Colleton
South Carolina	Darlington
South Carolina	Edgefield
South Carolina	Oconee
South Carolina	Pickens
South Carolina	Richland
South Carolina	Spartanburg
South Carolina	Union
South Carolina	Williamsburg
South Carolina	York
South Dakota	Pennington
Tennessee	Anderson
Tennessee	Blount
Tennessee	Davidson
Tennessee	Hamilton
Tennessee	Haywood
Tennessee	Jefferson
Tennessee	Knox
Tennessee	Lawrence
Tennessee	Meigs
Tennessee	Putnam
Tennessee	Rutherford
Tennessee	Sevier
Tennessee	Shelby
Tennessee	Sullivan
Tennessee	Sumner
Tennessee	Williamson

Tennessee	Wilson
Texas	Bexar
Texas	Brazoria
Texas	Brewster
Texas	Cameron
Texas	Collin
Texas	Dallas
Texas	Denton
Texas	El Paso
Texas	Ellis
Texas	Galveston
Texas	Gregg
Texas	Harris
Texas	Harrison
Texas	Hidalgo
Texas	Hood
Texas	Jefferson
Texas	Johnson
Texas	Kaufman
Texas	Montgomery
Texas	Nueces
Texas	Orange
Texas	Parker
Texas	Rockwall
Texas	Smith
Texas	Tarrant
Texas	Travis
Texas	Victoria
Texas	Webb
Utah	Box Elder
Utah	Cache
Utah	Davis
Utah	Salt Lake
Utah	San Juan
Utah	Utah
Utah	Weber
Vermont	Bennington
Vermont	Chittenden
Virginia	Alexandria City
Virginia	Arlington
Virginia	Caroline
Virginia	Charles City
Virginia	Chesterfield
Virginia	Fairfax
Virginia	Fauquier
Virginia	Frederick
Virginia	Hampton City
Virginia	Hanover
Virginia	Henrico
Virginia	Loudoun
Virginia	Madison
Virginia	Page

Virginia	Prince William
Virginia	Roanoke
Virginia	Rockbridge
Virginia	Stafford
Virginia	Suffolk City
Virginia	Wythe
Washington	Clallam
Washington	Clark
Washington	King
Washington	Mason
Washington	Pierce
Washington	Skagit
Washington	Spokane
Washington	Thurston
Washington	Whatcom
West Virginia	Berkeley
West Virginia	Cabell
West Virginia	Greenbrier
West Virginia	Hancock
West Virginia	Kanawha
West Virginia	Monongalia
West Virginia	Ohio
West Virginia	Wood
Wisconsin	Brown
Wisconsin	Columbia
Wisconsin	Dane
Wisconsin	Dodge
Wisconsin	Door
Wisconsin	Florence
Wisconsin	Fond Du Lac
Wisconsin	Green
Wisconsin	Jefferson
Wisconsin	Kenosha
Wisconsin	Kewaunee
Wisconsin	Manitowoc
Wisconsin	Marathon
Wisconsin	Milwaukee
Wisconsin	Oneida
Wisconsin	Outagamie
Wisconsin	Ozaukee
Wisconsin	Racine
Wisconsin	Rock
Wisconsin	Sauk
Wisconsin	Sheboygan
Wisconsin	St Croix
Wisconsin	Vernon
Wisconsin	Vilas
Wisconsin	Walworth
Wisconsin	Washington
Wisconsin	Waukesha
Wisconsin	Winnebago
Wyoming	Campbell

Wyoming	Teton